

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Twin Cities Safety LLC, d.b.a., HeartCert, et
al.,

Case No: 23-cv-03758-NEB-DJF

Plaintiffs,

v.

Roger Moe, in official capacity as Chair,
Trustee of the Minnesota State Colleges and
Universities, or successor thereto, et al.,

**DEFENDANTS' MOTION
TO DISMISS**

Defendants.

To: Plaintiffs, by and through their counsel, Erick G. Kaardal, of Mohrman, Kaardal & Erickson, P.A., 150 South 5th Street, Suite 3100, Minneapolis, MN 55402.

Pursuant to Rules 12(b)(6) and (1) of the Federal Rules of Civil Procedure, the above-captioned Defendants move the Court to dismiss Plaintiffs' Complaint that was filed December 7, 2023. This motion is based on the files, records and proceedings herein.

Dated: January 17, 2024

Respectfully submitted,

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s/ Kathleen Reitz

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